

May 13, 2021

VIA ECF

Hon. Stewart D. Aaron, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1970
New York, New York 10007

Re: Dejan Radman v. ELC Beauty LLC
Case No.: 20-CV-04017 (PAE) (SDA)

Dear Judge Aaron:

This firm represents Defendant ELC Beauty LLC (“Defendant”) in connection with the above-referenced matter.

We write jointly with counsel for Plaintiff to inform Your Honor that the parties have reached an agreement to resolve Plaintiff’s claims in this matter. The parties jointly respectfully request that the Court adjourn the parties’ May 31, 2021 fact discovery deadline *sine die* while the parties negotiate the terms of a formal agreement, and prepare the documents needed for the Court to approve the resolution of Plaintiff’s claims under the Fair Labor Standards Act.

Pursuant to Your Honor’s Individual Practices, Section I, D: (1) the original fact discovery deadline was April 15, 2021; (2-3) there has been one prior request for an extension of the fact discovery deadline, on March 18, 2021 (ECF No. 24), which the Court granted on March 19, 2021 (ECF No. 25); (2) the reason for this request is that the parties have reached an agreement in principle and seek to focus their time and resources on negotiating the terms of a formal agreement for Court approval; and (3) Plaintiff’s counsel joins in this request. Based on the foregoing, the parties respectfully request up to and including June 11, 2021 to submit their agreement and papers for the Court’s review.

Thank you for your courtesy and attention to this request.

Respectfully submitted,
JACKSON LEWIS P.C.

/s/ Wendy J. Mellk

Wendy J. Mellk

cc: All parties (via ECF)

4820-7290-8265, v. 2

Application GRANTED. The parties shall file their motion for settlement approval no later than June 11, 2021. The parties also shall consider whether they wish to consent to conduct all further proceedings before the undersigned, pursuant to 28 U.S.C. § 636(c). If all parties consent, they shall complete the Consent to Proceed Before a U.S. Magistrate Judge form available on the Court's website at https://nysd.uscourts.gov/sites/default/files/practice_documents/sdaConsentToProceedBeforeUSMagistrateJudge.pdf and return such form to the Clerk of Court. SO ORDERED.

Dated: May 14, 2021

A handwritten signature in blue ink, appearing to read "Att C A", is written over the date.